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July 16, 2002

## **BY ELECTRONIC COMMENT FILING SYSTEM**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Report of Amarillo License, L.P. for Station KNKA574 and  
High Plains Wireless, L.P. for Station KNLF919 on  
Implementation of TTY Digital Compatibility for 911  
Emergency Calling  
CC Docket No. 94-102**

Dear Ms. Dortch:

On behalf of Amarillo License, L.P. ("Amarillo") and High Plains Wireless, L.P. ("High Plains"), pursuant to CC Docket No. 94-102, Fourth Report and Order, we hereby submit their report on implementation of TTY digital compatibility for 911 emergency calling for Stations KNKA574 and KNLF919. On June 28, 2002, the Commission extended the final implementation date until December 31, 2003 for Amarillo and High Plains.<sup>1</sup>

### **Development Activities**

#### **(1) Network infrastructure software development**

Amarillo and High Plains currently use Lucent Technologies ("Lucent") as the infrastructure provider for their TDMA systems. However, Amarillo and High Plains are currently in the process of planning to replace their TDMA equipment with either CDMA

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<sup>1</sup> Amarillo and High Plains ask the Commission for waiver to file this report one day late.

or GSM equipment. Amarillo and High Plains intend to purchase replacement equipment that includes TTY digital compatibility.

## **(2) Handset development and testing plans**

As part of the process of planning to replace their TDMA equipment with either CDMA or GSM equipment, Amarillo and High Plains will make inquiries regarding handsets with TTY digital compatibility.

## **(3) Beta testing and lab testing**

The manufacturers are responsible for beta testing and lab testing.

## **(4) Release and general availability to carriers of network infrastructure software**

Amarillo and High Plains understand that most new network equipment with either the CDMA or GSM air interfaces will include TTY digital compatibility.

## **(5) Availability to carriers of full acceptance test units**

Amarillo and High Plains understand that full acceptance test units to be available for either the CDMA or GSM air interfaces.

## **(6) Efforts toward achieving digital wireless solution compatibility with enhanced TTY devices**

Amarillo and High Plains are currently in the process of planning to replace their TDMA equipment with either CDMA or GSM equipment. Amarillo and High Plains intend to purchase replacement equipment that includes TTY digital compatibility.

## **Testing and Deployment Activities**

### **(7) Carrier coordination of testing with PSAP**

The PSAP is not yet ready for TTY digital compatibility.

### **(8) Carrier testing activities, including field testing, consumer end-to-end testing and other necessary tests**

Testing cannot take place until Amarillo and High Plains have replaced their TDMA equipment with either CDMA or GSM equipment and the PSAP is ready.

**(9) Retail availability of necessary consumer equipment**

Amarillo and High Plains will make available handsets with TTY digital compatibility upon request.

**(10) Geographic scope of network infrastructure deployment**

Once Amarillo and High Plains replace their TDMA equipment with either CDMA or GSM equipment, TTY digital compatibility will be deployed throughout all parts of the Amarillo, TX MSA where Amarillo is capable of providing service to customers and all parts of the Amarillo, TX BTA where High Plains is capable of providing service to customers.

Please address any inquiries regarding this matter to the undersigned.

Respectfully submitted,

/s/

Eliot J. Greenwald

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